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Attorneys for Plaintiff Anchor Holdings
Limited

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ANCHOR HOLDINGS LIMITED, an
English Limited Company,

Plaintiff,

v.

UPPER EAST SIDE SUITES LLC, a
Delaware Limited Liability Company,
BENEDETTO CICO, an individual,
and CARLA CICO, an individual.

Defendants.

**CASE NO. 2:15-cv-05447-MMM-
FFM**

**DECLARATION OF JAMES B.
SAYLOR IN SUPPORT OF
PLAINTIFF'S REQUEST FOR
ENTRY OF DEFAULT**

*[Request for Entry of default and
[Proposed] Default by Clerk filed
concurrently herewith]*

I, James B. Saylor, declare and state as follows:

1. I am a member of the Bar of the State of New York, admitted *pro hac vice* to the bar of this Court for the above-entitled action. I am an associate of the law firm of Kelley Drye & Warren LLP, counsel for Plaintiff Anchor Holdings Limited ("Plaintiff" or "Anchor"). I have personal knowledge of all matters stated herein, and, if called as a witness, could and would testify competently thereto.

2. Plaintiff filed its Complaint in the above-captioned action on July 17,

1 2015. Thereafter, on August 12, 2015, Plaintiff effectuated service on Defendants
2 Upper East Side Suites LLC (“UESS”) and Benedetto Cico of the following
3 documents: Summons in a Civil Action and Complaint; Waiver of the Service of
4 Summons; Notice to Parties of Court-Directed ADR Program; Certification and
5 Notice of Interested Parties (Local Rule 7.1-1). A true and correct copy of the
6 Proofs of Service for both UESS and Benedetto Cico is attached hereto as Exhibit
7 A.

8 3. The time within which UESS or Benedetto Cico might answer,
9 respond, or otherwise move as to Plaintiff’s Complaint expired on September 2,
10 2015. UESS and Benedetto Cico have not answered, responded or otherwise
11 moved, and the time for UESS and Benedetto Cico to do so has not been extended.

12
13 I declare under penalty of perjury under the laws of the State of California
14 and the United States that the foregoing is true and correct.

15
16
17 DATED: September 28, 2015

By //s// James B. Saylor
James B. Saylor (admitted *pro hac vice*)
KELLEY DRYE & WARREN LLP

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20 Attorneys for Anchor Holdings, Ltd.